1	Daniel Berko - SBN 94912 819 Eddy Street		
2	San Francisco, CA 94109 Telephone: 415-771-6174		
3	Facsimile: 415-474-3748 E-mail: BerkoLaw@SBCglobal.net		
4	2 20		
5	Attorneys for Plaintiffs, DANIEL KEATING-TRAYNOR on behalf of himself and all others similarly situated		
6			
7			
8			
9	UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA		
10			
	,	CASE NO: CV-08-02907-MHP	
11	DANIEL KEATING-TRAYNOR on	CV-08-03035-MHP	
12	behalf of himself and all others similarly situated,	STIPULATION TO CONTINUE THE	
13	Plaintiff,	HEARING OF DEFENDANTS' MOTIONS FOR SANCTIONS UNDER	
14	AC SQUARE, COMCAST INC.;	FRCP 11 & 28 U.S.C. 1927, TO	
15	AFSHIN GHANEH; ANDREW BAHMANYAR; and DOES 1	DECEMBER 8, 2008	
16	THROUGH 60, inclusive,		
17	Defendants.))	
18)		
19			
20	The undersigned parties, by and through their counsel of record pursuant to Local Rule		
21	6-1, hereby stipulate and request an order to continue the hearing of defendants AC Square		
	INC, Andrew A. Bahmanyar and Afshin Gahneh Motions for Sanctions Under FRCP 11 & 28		
22	U.S.C. 1927 and plaintiff's cross request for sanctions, from November 24, 2008 at 2:00 p.m		
23 24	to December 8, 2008 at 2:00 p.m.		
	The stipulated request is accompanied by the declaration of Daniel Berko which sets		
25	forth the reasons for the requested enlargement of time, discloses all previous time		
26	modifications in the case and describes the effect the requested time modification would have		
27	on the schedule for the case.		
28			

n	1	
1		
2	Dated: November //, 2008	·
3	;	()
4	·	I Jamel / Zestie
5		DANIEL BERKO, Attorncy for Plaintiff DANIEL KEATING-TRAYNOR in his own
6		behalf and in behalf of all others similarly situated.
7	11	
8	Dated: November //, 2008	
9		
10		RONALD A. PETERS and BENJAMIN A.
11		EMMERT, Attorneys for Defendats AC SQUARE, AFSHIN GAHNEH and ANDREW
12		A. BAHMANYAR
13		
14	1	
15	Dated: November <u>†</u> , 2008	En M. Reding
16 17		DARYL S. LANDY and ANN MARIE REDING, Attorneys for Defendant COMCAST.
18	[PROPOSED] ORDER	
19	IT IS SO ORDERED THAT:	
20	Pursuant to the above stipulation, and having considered the declaration of Daniel Berko in	
21	support of this stipulation, the hearing of defendants Motions for Sanctions Under FRCP 11 &	
22	28 U.S.C. 1927 and Plaintiff's cross request for sanctions, is continued from November 24, 2008 at 2:00 p.m. to December 8, 2008 at 2:00 p.m. Dated: November 14, 2008 Hertorable Main ORDERED	
23	at 2:00 p.m. to December 8, 2008 at 2:00 p.m.	ATES DISTRICT
24	Dated: November <u>14</u> , 2008	
25		
26		adge of the IT IS SO OTODA
27		Z Marilyn H. Patel
28		Judge Maring
•	STIPULATION TO CONTINUE THE HEARING OF I FRCP 11 & 28 U.S.C. 192	DEFENDANTS TOR SANCTIONS UNDER
		7, TO DECEMBER 8, 2008 -2-
		5121.KIC1